



MAR 21 2000

Chiquita Processed Foods, LLC

WESTERN REGION • 1745 OXFORD STREET SE • SALEM, OREGON 97302
PHONE (503) 362-1228 • FAX (503) 361-3333

March 16, 2000

Department of the Army
Walla Walla District
Corps of Engineers
201 North Third Avenue
Walla Walla, WA 99362-1876

ATTENTION: Lower Snake River Study

Chiquita Processed Foods, LLC is submitting this letter in response to the Corps' request for comments on the Lower Snake River Juvenile Salmon Migration Feasibility Report, commonly referred to as the Corps EIS.

Chiquita Processed Foods, LLC is a Wisconsin based vegetable processor with processing plants located throughout the northwest and mid-west. In the northwest, Chiquita Processed Foods operates facilities located in Salem and Eugene, Oregon, Walla Walla, Washington, and Payette, Idaho. Our northwest facilities employ over 2,000 people in these communities. These employees, as well as hundreds of the growers that we depend on to deliver a quality product to our facilities, are all dependent on the Columbia/Snake River system for irrigation water and hydropower.

Chiquita Processed Foods, LLC is very interested in seeing a reasoned, balanced and effective salmon recovery plan adopted for the Columbia/Snake system. We strongly believe that the most effective plan will be one that follows the best science, uses common sense and can be implemented immediately. We also believe that salmon stocks in this region can be recovered without destroying the economic benefits the Columbia/Snake hydropower system provides for the region.

Summary of Recommended Actions:

1. Hydropower System:

- Adopt Alternative 3 - Major System Improvements. This alternative will enhance the already effective smelt transportation system and will improve the collection process at Lower Granite Dam. This alternative is consistent with current NMFS science and the CRI (Cumulative Risk Initiative) analysis that show passage survival through the lower four Snake dams is at an all time high. In fact, current survival through the lower Snake dams is equal to in-river survival measurements made prior to the construction of these dams.
- Reject Dam Breaching as an Alternative. Breaching makes no sense economically or scientifically. The only argument which could possibly lead to a breach decision would be a high "latent or delayed mortality" caused by the barging process. Current NMFS science, as reported in the Hydropower Appendix of the All-H paper, shows that "while some differences in smelt to adult return ratios exist between transported and undetected in-river migrants, no significant differences have been observed." Since the only possible argument for breach has not been observed, it cannot be considered a viable alternative, even without the consideration of economics.

2. Flow Augmentation:

- Discontinue Flow Augmentation as a Primal Recovery Measure. Flow augmentation does not work and is the most expensive measure currently being implemented on the Columbia/Snake River system. NMFS data shows absolutely no correlation between survival of Spring/Summer Chinook and flow and only a small correlation between flow and Fall Chinook.

Additionally, studies by Karl Dreher, Idaho Department of Water Resources, show that the flow augmentation does not increase water particle travel time through the Lower Snake River. Therefore, the rationale, as stated in the NMFS science documents, for utilizing flow augmentation is flawed and incorrect. This expensive practice needs to be discontinued.

3. Economic Studies - Drew Report:

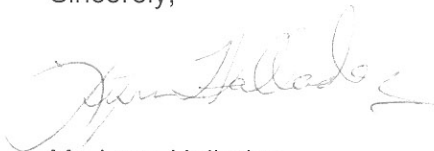
Review and Revise the Economic Projections, especially as they relate to the value of recreation. We seriously question the economic value of new recreation opportunities contained in the DREW report. The report estimates an \$82 million benefit to the region under a breach scenario. This estimate is grossly overestimated and does not accurately reflect the reality of actual use prior to the building of these four dams. We also believe, in light of recent projections by the Northwest Power Planning Council, that the region faces a serious power shortage, that the future value of the electric generation from these plants has been understated and that the report seriously undervalues the cost of mitigating the loss of barge transportation.

In conclusion, Chiquita Processed Foods agrees with the conclusions from the Cumulative Risk Initiative which states "... improvements in estuarine and early ocean survival or in the survival of newly born fish, will yield the greatest rewards in terms of enhanced population growth."

A balanced, well reasoned, scientific approach that includes the participation of landowners and companies such as ours and the rest of the region's shareholders will yield the surest, quickest, most effective solutions.

Thank you for the opportunity to comment on this most important issue.

Sincerely,



Mr. Lynn Halladey
Western Region Project Engineer
Chiquita Processed Foods, LLC